

# EXHIBIT 7

Proposed RICO Media Plan

January 20, 2011

The following is predicated on a filing the week of January 31<sup>st</sup>. The filing process itself creates a degree of ambiguity, so execution of the plan will have to be somewhat flexible. The plan is also structured around the announcement occurring in New York, with Hew Pate and Randy Mastro both there to speak with media.

1. Within one hour of the RICO filing being docketed, Chevron would issue its press release.
  - a. Calls to the Associated Press and the Wall Street Journal would also be placed to accelerate their coverage.
  - b. After the release is issued, staff will follow-up with top tier reporters to get them engaged on the issue
2. Within 2 hours of the release having been issued, Chevron would host a media conference call in which Hew and Randy can provide an overview of the filing and respond to questions. Access to the call would be controlled by staff in the same manner an earnings call is managed.
3. After the conference call, select one-on-one interviews would be sought out with key reporters. In consideration are:
  - a. Ben Casselman, WSJ
  - b. Cliff Krauss/John Schwartz/Peter Lattman, NYT
  - c. Chris Mondics, Philadelphia Inquirer
  - d. Matthew Bishop, The Economist
  - e. Michael Goldhaber, American Lawyer
  - f. Roger Parloff, Fortune
  - g. Sheila McNulty, FT
  - h. Steve Mufson, Washington Post
4. If there is interest and availability, the day could end with a round of TV interviews. Our recommendation would be appearances on CNBC and/or FOX News. Interviews would need to occur in studio and we would provide the networks with broadcast quality "Crude" outtakes earlier in the day.
5. Media outreach would conclude the following day with an editorial board meeting at Forbes magazine, hosted by Steve Forbes, and attended by Hew and Randy.

#### Active Media Engagements

Wall Street Journal – Call this morning with Andrea Neuman and Ben Casselman. Largely foundational, emphasis on understanding discussion from deposition transcripts and the emerging Cabrera story

Reuters – Three separate reports are working on at least four stories:

1. Braden Reddall is looking to write a feature on the 1782 discovery
2. Dan Levine is looking at the Patton Boggs entry into the litigation
3. Brian Grow is working on a larger series on the convergence of online public relations tactic and litigation. We would feature into his reporting as proof points

American Lawyer – Michael Goldhaber is working on a profile of Steven Donziger for the March 1 edition. The premise of the story is, “What was he thinking?”

Fortune – Roger Parloff is evaluating a story on litigation financing and sees our case as a timely angle.

Philadelphia Inquirer – Chris Mondics remains intrigued by the story and is looking for a Joe Kohn-related development for a hook.

Sunday Telegraph – An interview is set for Friday morning to discuss Burford’s role in the litigation.

GQ – We intend to respond to Sean Flynn’s questions by day’s end. Draft responses have been with legal since Monday.

Pitches are pending with Bloomberg TV and the New York Times.